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BEFORE THE ARIZONA CORPORATION COMMISSION

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WILLIAM A. MUNDELL
Chairman
JAMES M. IRVIN
Commissioner
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Commissioner

Arizona Corporation Commission

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AZ CORP COMMISSION
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**IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF 1996**

Docket No. T-00000A-97-0238

**AT&T'S COMMENTS ON QWEST
CORPORATION'S NOTICE OF
UPDATED STATEMENT OF
GENERALLY AVAILABLE TERMS
AND CONDITIONS**

AT&T Communications of the Mountain States, Inc., and TCG Phoenix (collectively "AT&T") hereby file their Comments on Qwest's September 23, 2002, filing ("Notice") containing its two exhibits to the SGAT, Exhibits B and K. Qwest incorrectly asserts that the Performance Indicator Definitions ("PID") contained in Exhibit B "14-State 271 PID Version 5.0" have been negotiated among the parties and agreed to.

Specifically, the attached Exhibit B contains Service Performance Indicator Definitions ("PIDs") that resulted from consensus reached among the parties.¹

While Qwest may desire that its PID reflects consensus, it does not; and, in several instances, the Arizona Technical Advisory Group ("TAG") has reached impasse over PID proposals advanced by Qwest. This Notice is also premature, as the parties may make significant changes to the PIDs before they reach consensus.

¹ Notice at 2.

I. THE 5.0 VERSION OF THE PID HAS NOT BEEN AGREED TO BY THE PARTIES.

On June 8, 2002, Qwest notified the TAG that it would be requesting that the TAG consider combining the ROC and Arizona PIDs into a 14-state version that maintained each version's unique elements, but within a single document structure. The TAG later met and reviewed some of the changes that would be incorporated into the Arizona PID, and it approved some of those reviewed changes. Not all PID changes that Qwest proposed were discussed in the TAG meetings, and not all of the discussed PID changes were approved.

On June 26, 2002, Qwest submitted the 14 State 271 PID document in a "working" version, *i.e.*, draft copy, to the TAG. The TAG subsequently met in June, July, August, and September, and at none of those meetings did the TAG approve the 14 State PID for Arizona.

Qwest should withdraw its Notice for approval of Exhibit B until it has reached consensus on the PID for Arizona working through the established TAG process.

II. DISPUTED PIDS ARE NOT DOCUMENTED IN EXHIBIT B TO THE NOTICE.

The Notice does not advise the Commission of the unsettled state of PIDs that have been proposed by Qwest and not accepted by the parties. It is misleading to suggest that the PIDs documented in Exhibit B are the product of consensus in Arizona, as several outstanding issues remain with PID PO-19, "Stand-Alone Test Environment (SATE) Accuracy" that have yet to be decided. Qwest should document the specific impasse issues in its Notice and in Exhibit B, and explain that the PID Version 5 will be updated to reflect the resolution of the PO-19 disputes within 10 days of Staff's decision.

III. THE PID DOES NOT REFLECT RESOLUTION OF PREVIOUS IMPASSES REGARDING MEASUREMENTS.

Staff resolved the impasse on PID PO-1B dealing with the means by which Qwest collects response time data for EDI pre-order transactions. The PO-1 contained in Exhibit B is deficient because it fails to describe the system of measuring and reporting that Qwest is to implement by end of year 2002. Qwest's PID Version 5 should describe the required measurement process and with an effective date-certain it has established to begin measuring PO-1B transactions.

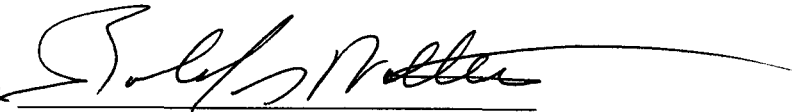
IV THE PID DOES NOT PROVIDE UPDATES TO COMMENTS THAT CHANGES WERE TO BE MADE BEGINNING WITH THE JUNE OF 2002 REPORT

Version 5 of the PID contains multiple references to changes that were under development and expected to be implemented in the June of 2002 report.² Qwest provided a version of the PID that was dated September 23, 2002. Qwest's September 23, 2002 version did not indicate whether or not those changes had indeed been implemented in June of 2002. The absence of any current language that reflects whether or not those changes were implemented in June of 2002 can lead to confusion in the interpretation of Qwest's PID results.

² See OP-3, OP-4, OP-5, OP-6, OP-15, MR-3, MR-4, MR-6, MR-7, MR-8 and MR-10.

Dated this 8th day of October, 2002.

**AT&T COMMUNICATIONS
OF THE MOUNTAIN STATES, INC.,
AND TCG PHOENIX**

By: 

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CERTIFICATE OF SERVICE

I certify that the original and 10 copies of AT&T's Comments on Qwest Corporation's Notice of Updated Statement of Generally Available Terms and Conditions in Docket No. T-00000A-97-0238 were sent by overnight delivery on October 8, 2002 to:

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